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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Truth-in-Billing

and

Billing Format

CC Docket No. 98-170

COMMENTS OF BELL ATLANTIC

Bell Atlantic¹ agrees completely with the Commission that telephone bills should be “both intelligible and legitimate” and that “consumers should be treated fairly.”² Moreover, the three principles stated in the Notice³ are fully consistent with what customers have told us they want — bills that are clearly organized, that contain clear descriptions of the items being billed and that advise the customer how to make inquiries about the charges. Bell Atlantic has every incentive to give its customers what they want — in bill format and content, just as in every other service we provide them.

¹ Bell Atlantic-Delaware, Inc., Bell Atlantic-Maryland, Inc., Bell Atlantic-New Jersey, Inc., Bell Atlantic-Pennsylvania, Inc., Bell Atlantic-Virginia, Inc., Bell Atlantic-Washington, D.C., Inc., Bell Atlantic-West Virginia, Inc., New York Telephone Company, New England Telephone and Telegraph Company (the Bell Atlantic telephone companies); and Bell Atlantic Communications, Inc.

² Notice ¶ 10.

³ Notice ¶ 10.

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For the reasons discussed below, however, the Commission should not impose any new rules concerning the content or format of carrier bills. Moreover, it is doubtful that the Commission has the legal authority to adopt many of the regulations it proposes in the Notice.

Bell Atlantic has no interest in billing for crooks and scoundrels. Billing for them only makes us look bad in our customers' eyes. As the Commission is aware, even before the industry wrote its "best practices guidelines" to combat cramming, Bell Atlantic had taken a number of steps to try to curb this abuse. As a result, Bell Atlantic has stopped billing for more than 70 service providers. The Commission should wait to see whether the industry's self-regulation is effective before considering additional rules and regulations.

In the Notice⁴ and at the Commission's Truth-in-Billing Forum, it was suggested that the Commission is considering the new rules proposed in the Notice to solve the problems of slamming and cramming. This notion is misguided.

First, changing the format of the telephone bill will not stop slamming and cramming — the format of the bill is not the cause of these problems. Second, if the federal government wants to stop slamming and cramming, it should go after the slammers and crammers directly. Intentional slamming and cramming are forms of consumer fraud. They violate existing rules and laws, both federal and state. The Commission, and other agencies and law enforcement officials with jurisdiction, should enforce the rules they have or, if needed, adopt new rules concerning these practices. The Commission should not try to get at these bad actors by creating a brand new system of rules and regulations for telephone company bills.

⁴ *E.g.*, Notice ¶ 3.

Bell Atlantic can also understand the Commission's annoyance with the major incumbent long distance companies, which received billions of dollars in access charge reductions and which did not pass their savings on to consumers. And Bell Atlantic can understand the added annoyance when these same companies added new line item charges to their bills, which they blamed on new federal government regulations. However, if the Commission wants to do something about these practices, it should do so directly — for example, by requiring the interexchange carriers to pass along the full amount of the access charge reductions they receive. The Commission should not try to solve its problems with these interexchange carriers by adopting new rules for exchange carrier billing. It also should not require exchange carriers to include on consumer bills descriptions and explanations of the sort suggested in paragraph 31 of the Notice. They will do nothing but utterly confuse the reader, who will then likely call his local telephone company for an explanation.⁵

As the telecommunications industry has gotten more complicated, telephone bills have become more complicated too. Billing systems that were designed in the 1970s or before — in the era of the integrated AT&T monopoly where a single company offered and billed only a few services — do not meet all the new requirements of the marketplace of the 1990s. And because of their age and complexity, these systems cannot be readily modified to accommodate the new requirements. As a result, the Bell Atlantic telephone companies are developing and introducing a new billing system (called expressTRAK) that will make bills easier to read, provide more

⁵ The Commission would have a first amendment problem if it tried to compel or to limit speech.

information and be more flexible. Consumers have been involved with us in the process of designing this new bill, and we believe that it will give them the kind of bill they want, with the flexibility to adapt to changes in the marketplace. The process of design, testing and implementation is not a fast one, however, and it takes a company like Bell Atlantic several years to complete it, and, as the Commission correctly recognizes,⁶ it is an extremely costly process. Materials describing the new bill format are attached.

The Commission should not adopt any new regulations concerning telephone bill content or format. This is true for several reasons. First, the Commission has no particular expertise in bill design, in what makes a bill easy to read and understand. For example, one of the proposals the Commission made in its Notice (separate bill sections on their own pages)⁷ is one of the four bill formatting “Don’ts” set out in materials distributed by billing consultants at the Commission’s Truth-in-Billing Forum. Second, the clarity and readability of their bills will be one way that competing carriers have of differentiating themselves in the marketplace. Third, carriers have another incentive to make their bills easier to understand — namely, to reduce the costs of handling customers who call their service representatives with billing questions. Fourth, there are already state rules that impose requirements on telephone bills and on carriers’ bill collection practices; adding an additional layer of regulation will only make the situation worse.

⁶ Notice ¶ 11.

⁷ Notice ¶ 17.

Therefore, the Commission should adopt no new regulations, should promptly enforce its existing rules and should deal with slammers and cramers directly rather than through regulation of local exchange carrier billing.

Respectfully submitted,


John M. Goodman

Michael E. Glover
Of Counsel

Attorney for the Bell Atlantic
Telephone Companies and
Bell Atlantic Communications, Inc.
1300 I Street, N.W.
Washington, D.C. 20005
(202) 336-7874

Dated: November 13, 1998

Answers to Specific Questions

The following are Bell Atlantic's responses to the specific questions and issues raised in the Notice. Unless otherwise indicated, whenever the Notice asks whether the Commission should adopt a regulation or otherwise impose a requirement, the answer is, "No." As indicated in the body of our comments, no additional regulation is required, and regulation would only inhibit providers' efforts to improve their bills.

General

1. Interested parties are encouraged to identify issues and problems confronting disabled subscribers as a result of the manner in which bills are prepared and disseminated by telecommunications carriers and to submit specific proposals to address these concerns.¹

Obviously, visually-impaired consumers can have difficulty reading their telephone bills, just as they have difficulty reading other bills. To meet this need, the Bell Atlantic telephone companies offer both Braille and large-print bills to consumers in most of their territory.²

2. To what extent should consumers have similar protections when charges for non-telephone service are billed through telephone bills rather than through other means.³

There are already extensive protections under both federal and state law and under telephone company tariffs, and the Federal Trade Commission is proposing additional regulations.⁴ There do not appear to be any gaps that need to be filled.

¹ Notice ¶ 6 n.16.

² Out of region, Bell Atlantic's long distance businesses bills through local exchange carriers, through non-carrier billing service suppliers, through underlying interexchange carriers and through billing clearinghouses, and the long distance business' bill format is dependent on these billing service providers' capabilities.

³ Notice ¶ 8.

⁴ *Pay-Per-Call Rule*, 63 Fed. Reg. 58524 (1998).

3. The Commission seeks comment on the extent to which any carriers already have in place practices similar to, or that have the same effect as the proposals in this Notice. Commenters should also assess the burdens that would be imposed by the proposals in this Notice and suggest less burdensome practices that would achieve the same goals.⁵

The Bell Atlantic telephone companies are developing a new customer billing system, which will produce bills that are clearer and easier to read. These bills will include a summary section and highlight changes in service since the last bill. They will clearly tell customers where to call with any billing questions.

The Bell Atlantic telephone companies' existing bills also provide much of the information suggested in the Notice, including notifying the customer of changes in her presubscribed carriers, separating charges by service provider (and then by type of service), identifying service providers and providing telephone numbers for the customer to call with billing questions.

Legal Authority

4. The Commission seeks comment on whether the Commission has jurisdiction to adopt each of the proposals in this Notice and asks commenters to address the jurisdictional basis of any additional proposals raised on the record of this proceeding.⁶

The Commission does not have jurisdiction over charges for intrastate telecommunications services or over how those charges are billed. Nor does it have jurisdiction over the charges for non-telecommunications services, even when those charges are billed on telephone company bills. As the Notice recognizes, the Commission also lacks jurisdiction over billing services provided by local exchange carriers, even billing for carriers that provide

⁵ Notice ¶ 11.

⁶ Notice ¶ 13.

interstate telecommunications services, and the Commission, therefore, may not impose conditions or regulations on those billing services.

The Commission plainly does have jurisdiction, however, over interstate telecommunications services. The Commission, therefore, may regulate the level of charges for these services, including how carriers providing interstate service may recover interstate costs, such as their contributions to federal universal service support programs.

5. The Commission seeks comment particularly on how its jurisdiction should complement that of the states and other agencies.⁷

Title III of the Telephone Disclosure and Dispute Resolution Act gives the FTC jurisdiction over billing of telephone-billed purchases, and that commission has actively exercised that jurisdiction and is currently proposing additional rules. This Commission should not duplicate this regulation.

The states have jurisdiction over intrastate services and the charges for those services. This generally includes the authority to regulate when a carrier may stop providing an intrastate service because the customer has not paid its bill. There is no need, or authority, for the Commission to interfere with this regulation.

Organization of the Bill

6. The Commission seeks comment on whether the visual separation of different services (including use of separate pages) would enhance a consumer's ability to distinguish among different services, service providers, and charges and allow consumers to determine quickly whether their bills contain any charges for services that have not been ordered or authorized, thereby deterring slamming and cramming. It suggests that bills should present separate categories of services (such as charges for local, long distance, and miscellaneous service) in clearly separate sections within the telephone bill and, if possible, on separate pages. The

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Notice ¶ 14.

Commission seeks comment alternatively on whether bills should be organized by provider with a description of the services furnished by each provider. It seeks comment on whether its proposals for segregation of charges for different services would serve a similar purpose in telephone bills generally.⁸

There is no perfect way — or single correct way — to design a telephone bill. One might group all like services together, or one might organize the bill by the service provider. Different billing companies could use different approaches, and all could produce bills that are clear and easy to read and understand. For these reasons, the Commission should not try to design, or to impose even general design requirements on, telephone bills, nor could it lawfully (or constitutionally) do so.

Furthermore, categories and distinctions that might have made sense ten years ago are increasingly irrelevant today and will be meaningless tomorrow. There once was a dividing line between local service and interLATA service. Today, only a few companies cannot offer packages that include both. These companies and others will add Internet access and video services for a single price to their full-service bundles. A billing format designed by regulators that perpetuates these categories and distinctions is simply inconsistent with the direction the marketplace and the industry are going.

The Bell Atlantic exchange carriers separate charges by service provider and then by type of service. We believe that this is clearer for the consumer than to sort charges based on the type of service, in part, because, there is no industry-standard sorting system. When service providers bill through a clearinghouse, the first separation is at the clearinghouse level, with further separation by service provider.

One specific comment — one thing that our customers have consistently told us is that our bills have too many pages. The Commission should definitely not impose any requirement that would add to the number of bill pages — for example, to place charges from different providers or different types of charges on separate pages.

7. The Commission proposes that bills include a single page or section summarizing the current status of the customer's services, including applicable information regarding: (1) the consumer's presubscribed interstate toll carrier; (2) the consumer's presubscribed intrastate toll carrier, if such carrier is not the same as the consumer's presubscribed interstate toll carrier; (3) the consumer's presubscribed local exchange carrier; (4) any other service providers, including those providing telecommunications and non-telecommunications related services, for whom charges are being billed; (5) whether carrier or preferred carrier freezes or other blocking mechanisms have been implemented for any presubscribed telecommunications services. The Commission seeks comment on this proposal and on any other information that would appropriately be included in the summary of the current status of the consumer's services.⁹

While this might sound like a good idea, nothing that Bell Atlantic has heard from consumers or learned from them in the process of redesigning our bill indicates that consumers want this sort of "current status" information with every bill they receive.

8. The Commission also seeks comment on whether telephone bills should provide consumers with clear and conspicuous notification of any changes or new charges in their telephone bills. For example, the Commission seeks comment on the benefits of having each telephone bill include, near the front of the bill, a separate page or section that highlights any changes in the consumer's service status information or new charges since the consumer's last bill. This "Status Changes" page could include applicable information on: (1) changes in presubscribed carriers; (2) any new service providers for whom charges are being billed for the first time or whose charges did not appear on the last telephone bill; (3) changes in any carrier or PC freeze status or blocking mechanism status; (4) explanations of any new types of line item charges appearing on the bill for the first time. The Commission seeks comment on whether requiring carriers to provide clear and conspicuous notification of any activity in a telephone bill that was not present in the last bill, including new charges and other changes, would help consumers defend themselves against cramming, slamming, and other types of fraud. It also seeks comment on any

⁸ Notice ¶ 17.

⁹ Notice ¶ 18.

other proposals that would serve to highlight to consumers any changes that have occurred on their telephone bills.¹⁰

A “status change” section would surely be more useful than the “current status” section suggested above. Bell Atlantic’s current exchange carrier bills notify customers of any changes in their presubscribed carriers. In addition, the Bell Atlantic telephone companies have designed an “Additions and Changes” section that will appear on the second page in their new bills.

It would not make sense, however, for the bill to highlight “any new service providers for whom charges are being billed for the first time or whose charges did not appear on the last telephone bill” or “any activity in a telephone bill that was not present in the last bill,” as the Notice suggests. Callers use more than one carrier in a month and use different carriers from one month to the next, for example on a dial-around basis or by using a calling card from a telephone presubscribed to a carrier other than their own. Customers also choose to use different services from month to month, for example, “return call” one month and “repeat call” the next. Highlighting these changes from month to month in detail consumers don’t want.

It would be no simple matter for telephone companies to produce these sorts of bills. To do what the Commission suggests, every month, Bell Atlantic would have to compare the charges on its new bills with its bills from the previous month and flag the differences. The burden of comparing billions of charges for Bell Atlantic’s more than 40 million lines far outweighs any conceivable benefit.

¹⁰

Notice ¶ 19.

Full and Non-Misleading Descriptions

Descriptions of Services and Identification of Providers

9. Both NARUC and the National Consumers League have proposed that each charge on a consumer's telephone bill be accompanied by a brief, clear, plain language description of the services rendered. The Commission seeks comment on whether such itemization would help consumers determine the precise nature of the services for which the Commission are being billed. The Commission seeks comment on the types of information that would assist consumers in understanding the charges on the bill. For example, Section 64.1510(a)(iii) of the Commission's rules requires that the bill "[s]pecify, for each pay-per-call charge made, the type of service, the amount of the charge, and the date, time, and, for calls billed on a time-sensitive basis, the duration of the call]." Also, for information services that appear on a phone bill and are provided through any toll-free telephone number, the Commission's rules require that the bill shall list the toll-free number dialed. The Commission seeks comment on whether similar requirements should apply to billing for other services on the telephone bill.¹¹

Bell Atlantic agrees that bills should include brief, clear, "plain English" descriptions of the charges billed. However, the Commission should not try to standardize the words used by service providers to describe their services. Moreover, at this time, the industry is constrained by the existing billing record exchange standard, which limits the length of a service description.

The amount of detail and description that is appropriate will vary for different types of services. It may well make sense for bills to include the level of detail required in section 64.1510(a)(iii) for relatively more costly calls that customers makes on a less frequent basis (such as, interLATA toll calls or calls to pay-per-call services). It might not make sense for calls that are relatively inexpensive that the customer makes many times per day. For example, itemizing every landline local call would greatly add to the length and complexity of the bill (as well as the cost of producing and mailing it), with little added benefit for consumers. However,

¹¹ Notice ¶ 22.

apparently because customers want it, itemization of local calls is a common practice in the cellular industry.

10. The Commission proposes that the name of the service provider be clearly and conspicuously identified in association with that entity's charges, that the name of the service provider itself must be included, and that listing the name of the billing aggregator or clearinghouse alone will not be sufficient, even if the aggregator or clearinghouse has full legal responsibility for the charges. The Commission also proposes that, in the case of an entity reselling the service of a facilities-based carrier, the name of the reseller must appear on the telephone bill. The Commission seeks comment on whether these proposals would help consumers determine the actual identity of the carrier that is providing service and also enable them to detect quickly if the customer has been slammed by another carrier. The Commission also seeks comment on whether these proposals would decrease consumer frustration by enabling the consumer to identify the correct carrier in the first instance, rather than being told by one entity after another that it is not the consumer's service provider.¹²

Bell Atlantic agrees that these are generally sound business practices, which bill-issuing carriers should seriously consider adopting but which the Commission should not mandate.

When billing for aggregators, Bell Atlantic currently lists both the name of the aggregator and the name supplied by the aggregator to identify the carrier or carriers on the aggregator's bill page.

Those carriers could be facilities-based carriers or resellers.

The one exception is the notion that the name of the "service provider" must always be shown on the bill. First, this is often inconsistent with how services are marketed — it could well be confusing to consumers who respond to advertising and use a service called "Lucky Dog" to see "AT&T" listed as their provider. Second, if the billing aggregator (or some other entity) is performing all billing inquiry and other customer care services for the provider, there is no need for the provider's name to be listed. It should be sufficient that the customer knows where to call with a billing question or complaint.

11. The Commission seeks comment on whether telephone bills should differentiate between “deniable” and “non-deniable” charges. The Commission seeks comment on methods for differentiating between deniable and non-deniable charges, such as including a prominent disclosure at the top of the page or section stating that non-payment of certain charges would not result in the termination of the customer’s local exchange or long distance service. The Commission seeks comment on whether the expansion of this requirement to all charges for which service may not be terminated for non-payment would enable consumers to make more informed choices about the use of services and the payment of charges. The Commission also seeks comment on whether giving the consumer this type of information in the bill itself would discourage unscrupulous service providers from contacting the consumer directly to misinform the consumer as to the consequences of non-payment.¹³

The question of when a carrier may stop providing local service because of a customer’s failure to pay other charges is really a term or condition of the local service. This, of course, is within the states’ rather than the Commission’s jurisdiction. For this reason alone, the Commission should not adopt any of the suggested requirements.

It is reasonable that customers know what their rights are and what will happen if they do not pay their telephone bill. This, of course, should be stated clearly and in “plain English.” Use of the terms “deniable” and “undeniable” would only confuse consumers, as the connotations of those terms are the exact opposites of their meanings in the telecommunications billing context.

However, Bell Atlantic does not think that customers should be encouraged not to pay their bills. This would likely be the effect of requiring that bills have flashing neon lights highlighting charges that the customer has less obligation to pay. The overwhelming majority of the billions and billions of charges we bill — both our own and those we bill for other providers — are legitimate. Bills should not suggest that it’s OK not to pay some of the charges on them.

¹² Notice ¶ 23.

¹³ Notice ¶ 24.

Bell Atlantic disagrees with the notion that giving consumers this type of information will be useful to them in making more informed choices about their use of services. The suggestion has typically been that consumers believe that they must pay everything that's on their phone bills or else they will lose phone service. And yet, they still agree to have service providers bill them in that way. There is no reason to believe that they will use this billing mechanism even more if they realize that this is not the case (and this information certainly wouldn't cause them to use it any less).

Descriptions of Charges Resulting from Federal Regulatory Action

12. Commenters should address whether the Commission should prescribe "safe harbor" language that carriers, or some subset of carriers, could use to ensure that they are meeting their obligations to provide truthful and accurate information to subscribers with respect to the recovery of universal service, access, and similar charges, and how such language could be distributed most effectively.¹⁴

The Commission should not prescribe language for carrier bills. However, it would be helpful to the industry if the Commission would provide an example of the type of language that it believes to be informative and not misleading, both for the line item description of the charge and for any other description that the Commission believes to be appropriate.

These charges are typically applied every month. However, if the Commission develops descriptive language (beyond the line item description), it should not be required on every bill. It should be sufficient that this additional disclosure be provided on a regular periodic basis.

13. Should long distance carriers that include a separate line item for the recovery of universal service contributions be required to explain the net reduction in their costs of providing long distance service since enactment of the 1996 Act?¹⁵

¹⁴ Notice ¶ 27.

¹⁵ Notice ¶ 28.

Line item charges let consumers know what they are paying for and, therefore, are completely consistent with the Commission's goal of truth in billing. Governmental agencies should get involved only where the use of line items is deceptive or misleading, and that involvement should be on a case-by-case basis.

If the Commission does impose additional requirements on the use of universal service line item charges (which it should not), the requirements should apply only to facilities-based interstate interLATA carriers. They should not apply to resellers which do not buy access services directly from local exchange carriers (because they have no way of knowing what reductions the facilities-based carrier received or what was passed on to them) or to other carriers which do not buy interstate access services. The requirement also should not apply to the extent that a carrier did not provide interstate long distance service on the date of enactment of the 1996 Act.

Under the terms of the Notice, any requirement of this type would not apply to CMRS providers, as they are not "long distance carriers." This makes sense because CMRS providers did not receive access charge reductions after the 1996 Act.

14. Should carriers that pass on the PICC as a line item on the customer bill be required to disclose exact cost reductions, such as a reduction in access charge costs, or other related benefits arising from government action or to show whether the corresponding reduction in the per-minute rate was actually passed on to that individual consumer?¹⁶

¹⁶ Notice ¶ 31.

If the Commission imposes a requirement to disclose the access charge savings carriers enjoyed as a result of the FCC's establishment of the PICC, it should include the same exceptions as above.

15. Should carriers include the exact cost of PICC and universal service obligations incurred as a result of serving that customer? Is it a misleading or unreasonable practice under section 201(b) of the Act for a carrier to impose charges that are ascribed to the payment of universal service or access charges, but that exceed the cost of these items attributable to that consumer?¹⁷

For marketing or customer relations reasons, a carrier might reasonably conclude that a fixed monthly charge is preferable to one that varies from month to month. It, therefore, should be reasonable for a carrier to use average universal service, PICC or other regulatory costs in calculating its charges to customers or classes of customers.

16. The Commission seeks comment as to whether these proposals with regard to line item charges for universal service and access charges would be too regulatory and burdensome to carriers or possibly confusing to consumers.¹⁸

This may well be one of those unusual cases where more information will not help consumers, and it is certainly too regulatory.

Provision of Consumer Inquiry/Complaint Information

17. The LECs, NARUC, and the National Consumers League have made proposals that would require each telephone bill to include, in addition to the name of each service provider, a business address and toll-free telephone number for the receipt of consumer inquiries and complaints. The

¹⁷ Notice ¶ 31.

¹⁸ Notice ¶ 32.

Commission seeks comment on whether these requirements would enable consumers to initiate action to resolve any billing questions or inquiries.¹⁹

Most customers call when they have questions. They do not write. Therefore, there would be little value in having a mailing address on the bill.

¹⁹

Notice ¶ 34.

ATTACHMENT

1193040462764106990340200860413500000000000000000082851800000

Billing Date 3/13/96
Account 000014817287 52Y
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Questions? Billing: Call (800) 544-5663
Orders: Call (800) 544-5663

Bell Atlantic Services and Equipment Information - Lists the products and services that are included in your monthly charges. Replaces CSR.

Bell Atlantic Services and Equipment Information

Summary of Services

Following is a Summary of Recurring Monthly Charges for Informational Purposes.
Total Charges Due appear on Page 1 of your bill.

Monthly Service

| Description | Qty | Amount |
|--------------------------------|-----|--------|
| 1. Additional Listing | 14 | 11.52 |
| 2. Bell Atlantic IQ Card | 10 | .00 |
| Unrestricted | | |
| 3. Call Forwarding - Variable | | |
| 4. Call Pick-up and Call Hold | | |
| 5. Call Transfer, Consultation | | |
| Hold and Three-way Calling | | |
| 6. Centrex Line - Unrestricted | | |
| Exchange Access | | |
| 7. Centrex Line - Unrestricted | | |
| Intercommunication | | |
| 8. Sentry III Enhanced | | |
| Maintenance Service | | |
| 9. Speed Calling | | |
| 6-Number Capacity | | |

Total Summary of Services

Customer Information

Bell Atlantic is a utility regulated by the P
PAYMENT IN
tic, P.O.
day
bunt o
ys to
will no
one, y
to notify before your service is disconnected
physically or emotionally incapacitated ar
call your business office. For information
Guide" in the front of your phone book.
Federal Tax Identification Number 55-0142

Summary Charges for Directory Assistance, Taxes and Surcharges.

Monthly Charges - Fixed
charges you pay on a monthly basis for service.

Bell Atlantic Charges - Includes payments, credits and adjustments, monthly charges and an itemization of charges for calls from each telephone number billed to your account.

Billing Date 3/13/96
Account 000014817287 52Y
Page 3 of 33

Questions? Billing: Call (800) 544-5663
Orders: Call (800) 544-5663

Bell Atlantic Monthly Charges

Monthly Service from Mar 13, 1996 thru Apr 12, 1996 \$ 472.37

Directory Assistance Call Summary

| Description | Calls | Amount |
|--|-------|----------------|
| Directory Assistance | 12 | |
| 1. Directory Assistance Charges | 12 | at \$.50 6.00 |
| 2. Calls Completed by Directory Assistance | 1 | at \$.30 .30 |
| | | 6.30 |

Taxes and Surcharges

| Description | Amount |
|-----------------------------------|--------|
| 3. Federal Subscriber Line Charge | 114.09 |
| 4. Telecommunication Access Fee | .24 |
| 5. Tax: | 3.21 |
| 911 Fee: 3.21 | |
| | 117.45 |

Total Bell Atlantic Monthly Charges \$596.12

* Includes charges for non-regulated product(s) or service(s).

Bell Atlantic Local Calls Summary

Local Calls

| Rate | Band | Initial Minutes | Add Minutes | Amount |
|--|------|-----------------|-------------|-----------------|
| 6. Peak | 1 | 1374 | 2158 | 138.71 |
| Off-Peak | 1 | 227 | 337 | |
| 7. Peak | 2 | 0 | 0 | .09 |
| Off-Peak | 2 | 1 | 1 | |
| 8. Peak | 3 | 7 | 19 | 3.14 |
| Off-Peak | 3 | 6 | 40 | |
| 9. Peak | 4 | 642 | 755 | 147.48 |
| Off-Peak | 4 | 446 | 819 | |
| 10. Peak | 5 | 2 | 7 | 1.45 |
| Off-Peak | 5 | 1 | 14 | |
| | | 2706 | 4150 | 290.87 |
| 11. 70% Discount off Off-Peak Rate Charges | | | 90.58 | 63.41 |
| Total Bell Atlantic Local Calls | | | | \$227.46 |

expressTRAKSM **Summary Billing**

ONE BILL FOR YOUR MANY LOCATIONS

THE BILLING OPTION THAT CONSOLIDATES SERVICE AND EQUIPMENT BILLING FOR MULTIPLE LOCATIONS INTO ONE MASTER BILL.

Multiple offices, departments, and branches may be part of your organization, but multiple telecommunication bills don't have to be part of doing business. Now, with expressTRAK Summary Billing, Bell Atlantic will consolidate charges and data from all your bills into one master bill. You have just one bill to analyze . . . and just one account number and due date to remember.

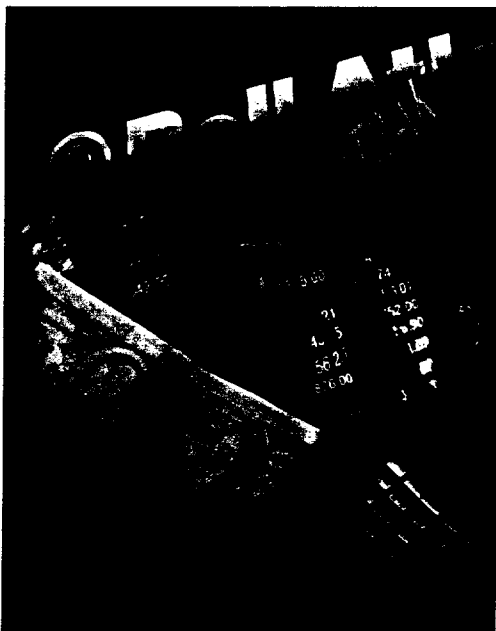
AVAILABILITY

expressTRAK Summary Billing will be available beginning in the fall of 1996. State by state deployment will be completed by Fall, 1997. After all states within the Bell Atlantic region are converted to the expressTRAK billing system, regional Summary Billing will be available.

BETTER CONTROL OVER ROUTINE ACCOUNTING AND FINANCIAL ANALYSIS

Because your master bill includes data from all your locations within the Bell Atlantic service area, you can greatly reduce the duplication of internal resources now being used to process and analyze multiple telecommunications bills. The ability to analyze multiple bills all at once gives you a much better overview of overall costs, usage patterns, and cost allocations. Best of all, your one master bill includes all the enhanced information now provided through Bell Atlantic's new expressTRAK billing system, including:

- Your total bill
- Toll detail
- Local message summaries by line
- Additional charges and credits (AC&C)
- Service & Equipment — this will replace your Customer Service Record (CSR) and enables you to review your services and perform internal cost allocation.



THE BILLING DETAIL YOU NEED ON EACH LOCATION

Although you only make one payment per month, you can analyze Bell Atlantic charges for specific offices throughout the month. At any time, you can pull out charges for a specific branch, department, or other "invoice point." These charges can easily be billed to individual offices while you receive full details of the items billed to each account.

ELECTRONIC BILLING MEDIA GIVE YOU EVEN GREATER ADVANTAGES

expressTRAK Summary Billing is available in a wide variety of media, including paper, PowerBill™ CD-ROM, Bell Atlantic Magnetic Tape (BAMT), or Electronic Data Interchange (EDI). By shifting from a paper bill to electronic media, you can cut substantial time and money from your billing process as you enhance your ability to search, retrieve, and analyze data and create customized reports. To tailor the very best solution for your needs, be sure to discuss your specific requirements with your Bell Atlantic representative.

For more information on expressTRAK Summary Billing, contact your Bell Atlantic Account Representative.



Visit our Home Page on the Internet at <http://www.bell-atl.com/>

expressTRAKSM

BILLING INTO THE NEXT MILLENNIUMSM

Introducing the new ordering and billing system that translates accuracy, fast turnaround, and flexibility into bottom-line benefits for Bell Atlantic customers.

Bell Atlantic presently produces 14 million billing statements each month. We recognize that it will take more to satisfy the billing needs of our customers in the next millennium. That's why Bell Atlantic is converting to the new Bell Atlantic® expressTRAKSM billing system.

A BRAND NEW ERA OF PRODUCTIVITY, CONTROL, AND SAVINGS.

expressTRAK is a powerful, flexible, "next-generation" system that consolidates billing information into one comprehensive, regional bill. Information is formatted to your requirements, customized for your needs, and delivered with greater speed and accuracy than ever before.

expressTRAK BILLS ARE EASIER TO RECONCILE

The new expressTRAK system allows Bell Atlantic to print bills in a larger 7" x 11" format that's easier to handle. Printing on both sides saves valuable resources. It takes less space for you to store the bills and less time to route information and allocate charges. New electronic delivery options offer even more efficiency, with full billing details available on demand. Plus, you have available an interactive, on-line environment for connecting with Bell Atlantic to initiate payment and resolve billing questions *fast*. Electronic delivery eliminates mail delays. The expressTRAK system means *you* can devote far less time, money, and staff to bill reconciliation.

expressTRAK AT A GLANCE

- New 7" x 11" format printed-on-both-sides
- Three electronic bill formats
- Greater accuracy reduces time spent on bill reconciliation
- Greater flexibility provides valuable summary billing
- Faster response on billing inquiries
- Quicker delivery of new services
- Service requests allow *different* services to be accepted on one transaction
- Plain-English terminology makes it easy to understand the bill



A FAST TRACK TO THE PAPERLESS OFFICE!

Through the expressTRAK billing system, Bell Atlantic gives you a choice of efficient, economical electronic billing media:

- **Bell Atlantic Power Bill™** (CD-ROM)
- **Electronic Data Interchange** (EDI on-line)
- **BAMT** (Bell Atlantic Magnetic Tape)

You will receive your first choice of billing media at no charge. Charges will apply to any additional billing media requested. Customers who select electronic media will receive paper copies for the first three months following changeover at no charge.

If you currently receive your billing data in magnetic tape or EDI format, you may need to modify your existing program and processes. Your Bell Atlantic account team can advise you on what's required.

Through these electronic services, you can have a direct link to Bell Atlantic's new expressTRAK billing system.

expressTRAK WILL REPLACE THE PRESENT BELL ATLANTIC SERVICE ORDER AND BILLING SYSTEMS:

Customer service requests will be processed in plain-English terminology instead of USOC codes. In addition, Bell Atlantic IntelliReport™ will be discontinued. You will receive reporting functionality through an expressTRAK CD-ROM-based service called PowerBill.

For more information on expressTRAK, contact your Bell Atlantic Account Representative



Visit our Home Page on the Internet at <http://www.bell-atl.com/>

CERTIFICATE OF SERVICE

I, Mary Liz Hepburn, hereby certify that on this 13th day of November, 1998, a copy of the foregoing Comments of Bell Atlantic was served on the following parties via US mail or, where indicated by an asterisk, hand-delivery.


Mary Liz Hepburn

Ms. Judy Boley *
Federal Communications Commission
Room 234
1919 M Street, NW
Washington, DC 20554

ITS, Inc. *
1919 M Street, NW
Room 246
Washington, DC 20554

(paper and disk copies)

Timothy Fain
OMB Desk Officer
10235 NEOB
725 17th Street, NW
Washington, DC 20503

Ms. Anita Cheng *
Federal Communications Commission
Common Carrier Bureau
2025 M Street, NW
Sixth Floor
Washington, DC 20554

(Disk copy and cover letter only)
